

1 CARI K. DAWSON (GA SBN 213490)
2 Email: cari.dawson@alston.com
ALSTON + BIRD LLP
3 1201 West Peachtree Street
4 Atlanta, GA 30309
Telephone: (404) 881-7766
Facsimile: (404) 253-8567

5 LISA GILFORD (CA SBN 171641)
6 Email: lisa.gilford@alston.com
ALSTON + BIRD LLP
7 333 South Hope Street, 16th Floor
8 Los Angeles, CA 90071
Telephone: (213) 576-1000
Facsimile: (213) 576-1100

9 *Lead Defense Counsel for Economic
10 Loss Cases*

1 VINCENT GALVIN, JR. (CA SBN 104448)
2 Email:
vincent.galvinjr@bowmanandbrooke.com
BOWMAN AND BROOKE
3 1741 Technology Drive, Suite 200
4 San Jose, CA 95110
Telephone: (408) 279-5393
Facsimile: (408) 279-5845

5 JOEL SMITH (SC SBN 5266)
6 Email: joel.smith@bowmanandbrooke.com
BOWMAN AND BROOKE
7 1441 Main Street, Suite 1200
Columbia, SC 29201
Telephone: (803) 726-7420
Facsimile: (803) 726-7421

8 *Lead Defense Counsel for Personal
9 Injury/Wrongful Death Cases*

10
11
12 **UNITED STATES DISTRICT COURT**
13
14 **CENTRAL DISTRICT OF CALIFORNIA**

15 IN RE: TOYOTA MOTOR CORP.
16 UNINTENDED ACCELERATION
MARKETING, SALES PRACTICES, AND
PRODUCTS LIABILITY LITIGATION

17 This document relates to:

18 **ALL ECONOMIC LOSS CASES**

19 Case No.: 8:10ML2151 JVS (FMOx)

20 **NOTICE OF FILING REDACTED
21 VERSIONS OF DOCUMENTS
22 SUBJECT TO TOYOTA'S
23 APPLICATION TO FILE AND
24 MAINTAIN UNDER SEAL
25 DOCUMENTS IN SUPPORT OF (1)
26 TOYOTA'S RESPONSE TO
CERTAIN ECONOMIC LOSS
PLAINTIFFS' MOTION FOR THE
APPLICATION OF CALIFORNIA
LAW AND (2) TOYOTA'S CROSS-
MOTION FOR CHOICE-OF-LAW
DETERMINATION AS TO ALL
ECONOMIC LOSS CASES AND
PLAINTIFFS BEFORE THIS
COURT**

27 **PART 10 OF 10 [EXHIBITS FF-II]**

28 Date: May 16, 2011
Time: 3:00 pm
Location: Court Room 10C
Judicial Officer: Hon. James V. Selna

1 Pursuant to Section 19 of the First Amended Protective Order entered by the
2 Court on January 19, 2011 (Doc. 627) ("Protective Order"), Toyota hereby files
3 redacted versions of the following documents which were submitted to the Court
4 under seal on April 1, 2011 in support of (1) Toyota's Response to Certain Economic
5 Loss Plaintiffs' Motion for the Application of California Law and (2) Cross-Motion
6 for Choice of Law Determination as to All Economic Loss Cases and Plaintiffs Before
7 this Court:

8 1. The following exhibits to the Declaration of Cari K. Dawson in Support
9 of (1) Toyota's Response to Certain Economic Loss Plaintiffs' Motion for the
10 Application of California Law and (2) Toyota's Cross-Motion for Choice-Of-Law
11 Determination as to All Economic Loss Cases and Plaintiffs Before this Court:¹

- 12 • **Exhibit K** (Ernest Bastien deposition transcript and exhibits),
13 which is attached hereto as Exhibit A;
- 14 • **Exhibit M** (Steve Curtis deposition transcript and exhibits), which
15 is attached hereto as Exhibit B;
- 16 • **Exhibits N.1 and N.2** (Masanori Hirose deposition transcripts and
17 exhibits), which is attached hereto as Exhibit C;
- 18 • **Exhibits O.1 and O.2** (Hijame Kitamura deposition transcripts
19 and exhibits), which are attached hereto as Exhibit D;
- 20 • **Exhibit P** (Robert Landis deposition transcript and exhibits),
21 which is attached hereto as Exhibit E;
- 22 • **Exhibit Q** (John Lang deposition transcript and exhibits), which is
23 attached hereto as Exhibit F;

24
25 ¹ Because of the extensive amount of "Confidential" and/or "Highly
26 Confidential" information contained therein (to include personally identifiable
27 information), the following exhibits to the Declaration of Cari K. Dawson cannot be
28 redacted in any meaningful way and thus remain subject to being sealed in their
entirety pending the approval of the Court: Exhibit K.K.2; Exhibit K.K.4; Exhibit
K.K.5; Exhibit K.K.7; Exhibit K.K.8; and Exhibits OO.1 through OO.5. For that
reason, these exhibits are not being reattached to this Notice.

- 1 • **Exhibits R.1 and R.2** (Tsutomo Miyazaki deposition transcripts
2 and exhibits), which are attached hereto as Exhibit G;
- 3 • **Exhibits S.1 and S.2** (Takashi Nakanishi deposition transcripts
4 and exhibits), which are attached hereto as Exhibit H;
- 5 • **Exhibit T** (Kevin Ro deposition transcript and exhibits), which is
6 attached hereto as Exhibit I;
- 7 • **Exhibit U** (Kojiro Tanaka deposition transcript and exhibits),
8 which is attached hereto as Exhibit J;
- 9 • **Exhibit V** (Robert Waltz deposition transcript and exhibits), which
10 is attached hereto as Exhibit K;
- 11 • **Exhibit W** (Robert Young deposition transcript and exhibits), which
12 is attached hereto as Exhibit L;
- 13 • **Exhibit X** (Lucy Barker deposition transcript and exhibits), which
14 is attached hereto as Exhibit M;
- 15 • **Exhibit Y** (Wanda Bosse deposition transcript and exhibits),
16 which is attached hereto as Exhibit N;
- 17 • **Exhibits Z.1 and Z.2** (Alexander Farrugia deposition transcripts
18 and exhibits), which are attached hereto as Exhibit O;
- 19 • **Exhibit AA** (Carole Fisher deposition transcript and exhibits),
20 which is attached hereto as Exhibit P;
- 21 • **Exhibit BB** (Connie Kamphaus deposition transcript and exhibits),
22 which is attached hereto as Exhibit Q;
- 23 • **Exhibit CC** (Patrick Mann deposition transcript and exhibits),
24 which is attached hereto as Exhibit R;
- 25 • **Exhibit DD** (Alison Oliver deposition transcript and exhibits),
26 which is attached hereto as Exhibit S ;

- **Exhibit EE** (Karen Pedigo deposition transcript and exhibits), which is attached hereto as Exhibit T;
- **Exhibit FF** (Georgeann Whelan deposition transcript and exhibits), which is attached hereto as Exhibit U;
- **Exhibit GG** (Carole Young deposition transcript and exhibits), which is attached hereto as Exhibit V;
- **Exhibit HH** (Dionne Colvin deposition transcript and exhibits), which is attached hereto as Exhibit W;
- **Exhibits II.1 and II.2** (Barry Hare deposition transcripts and exhibits), which are attached hereto as Exhibit X;
- **Exhibit JJ** (Doug Stevens deposition transcript and exhibits), which is attached hereto as Exhibit Y;
- **Exhibits LL.1 through LL.76** (Stipulations by Plaintiffs), which are attached hereto as Exhibit Z;
- **Exhibits MM.1 through MM.3** (Stipulations by Toyota), which are attached hereto as Exhibit AA;
- **Exhibits NN.1 through NN.46** (Plaintiffs' financing, purchase and lease agreements), which are attached hereto as Exhibit BB.

2. The Declaration of Steve Appelbaum and exhibits thereto, which are attached hereto as Exhibit CC.

3. The Declaration of Dionne Colvin and exhibits thereto, which are attached hereto as Exhibit DD.

4. The Declaration of Masanori Hirose and exhibits thereto, which are attached hereto as Exhibit EE.

5. The Declaration of Hajime Kitamura and exhibits thereto, which are attached hereto as Exhibit FF.

6. The Declaration of Tsutomo Miyazaki and exhibits thereto, which are attached hereto as Exhibit GG.

7. The Declaration of Takashi Nakanishi and exhibits thereto, which are attached hereto as Exhibit HH.

8. Redacted Memorandum of Points and Authorities in Support of (1) Toyota's Response to Certain Economic Loss Plaintiffs' Motion for the Application of California Law and (2) Toyota's Cross-Motion for Choice of Law Determination as to All Economic Loss Cases and Plaintiffs Before this Court, which is attached hereto as Exhibit II.

The above-listed documents have been redacted to protect against the disclosure of information and materials that have been designated as “Confidential” or “Highly Confidential” by the parties for purposes of the Protective Order, including, without limitation, to protect against the disclosure of personally identifiable information.

11

11

111

11

111

111

11

111

11

11

111

11

111

111

1 Dated: April 8, 2011

Respectfully submitted,

2
3 By: _____/s/
Lisa Gilford

4
5 CARI K. DAWSON (GA SBN 213490)
Email: cari.dawson@alston.com
6 **ALSTON + BIRD LLP**
1201 West Peachtree Street
Atlanta, GA 30309
7 Telephone: (404) 881-7766
Facsimile: (404) 253-8567

8
9 LISA GILFORD (CA SBN 171641)
Email: lisa.gilford@alston.com
10 **ALSTON + BIRD LLP**
333 South Hope Street, 16th Floor
Los Angeles, CA 90071
11 Telephone: (213) 576-1000
Facsimile: (213) 576-1100

12 ***Co-Lead Defense Counsel for Economic Loss Cases***

13
14 VINCENT GALVIN, JR. (CA SBN 104448)
E-mail: vincent.galvinjr@bowmanandbrooke.com
15 **BOWMAN AND BROOKE**
1741 Technology Drive, Suite 200
16 San Jose, CA 95110
Telephone: (408) 279-5393
17 Facsimile: (408) 279-5845

18
19 JOEL SMITH (SC SBN 5266)
E-mail: joel.smith@bowmanandbrooke.com
20 **BOWMAN AND BROOKE**
1441 Main Street, Suite 1200
Columbia, SC 29201
21 Telephone: (803) 726-7420
Facsimile: (803) 726-7421

22 ***Lead Defense Counsel for Personal Injury/Wrongful
Death Cases***